

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
NO. 5:18-CR-452-1-FL

UNITED STATES OF AMERICA	)	UNITED STATES' MOTION FOR
	)	AN ORDER FOR DISCLOSURE OF
v.	)	VIDEO AND/OR AUDIO
	)	<u>RECORDINGS</u>
LEONID ISAAKOVICH TEYF	)	

The United States of America, by and through the United States Attorney for the Eastern District of North Carolina, hereby moves this Honorable Court for an order, pursuant to Title 28, United States Code, Section 1651, authorizing and requiring Wake County, North Carolina, through the Wake County Sheriff and Wake County Detention Center, to release to the United States any and all audio and video recordings of the areas and rooms of the Wake County facilities in which defendant Leonid Isaakovich Teyf would have undergone the booking process or waited to be booked, to include holding cells, following his arrest. Upon information and belief, these audio/video recordings would primarily be dated December 5, 2018, but may include December 6, 2018.

Contact was made with counsel for defendant Leonid Isaakovich Teyf. Consent to this motion was given and the government assured counsel it would provide notification to counsel upon the government's receipt of any such recordings.

WHEREFORE, the United States respectfully requests that the Court issue an order authorizing and requiring Wake County, North Carolina, through the Wake

County Sheriff, to provide the described audio and video recordings. Once obtained, the defendant will be notified, the recordings will be made a part of the government's discovery, and it will be provided to the defendant(s).

Respectfully submitted, this 13th day of January, 2019.

ROBERT J. HIGDON, JR.  
United States Attorney

BY: /s/ Barbara D. Kocher  
BARBARA D. KOCHER  
Assistant United States Attorney  
Criminal Division

CERTIFICATE OF SERVICE

This is to certify that I have this 13th day of January 2019, served a copy of the foregoing upon the defendants by filing the foregoing with the Clerk of Court, using the CM/ECF system which will send notification of such filing to the defendant's counsel of record.

**Benjamin F. Leighton**

Moore & Van Allen PLLC  
100 North Tryon Street, Suite 4700  
Charlotte, NC 28202-4003  
704-331-1000

**James E. Hairston, Jr.**

Hairston Lane Brannon, PA  
434 Fayetteville St.  
Raleigh, NC 27602  
919-838-5295

**James P. McLoughlin, Jr.**

100 N. Tryon St., Suite 4700  
Charlotte, NC 28202-4003  
704-331-1000

**Robert Julius Lane, III**

Hairston Lane, PA  
Two Hanover Square  
434 Fayetteville Street, Suite 2350  
Raleigh, NC 27601  
919-838-5295

**Nathan A. White**

100 North Tryon Street, Suite 4700  
Charlotte, NC 28202-4003  
704-331-3580

**Christian Emerson Dysart**

Dysart Willis, PLLC  
507 N. Blount Street  
Raleigh, NC 27604  
919-747-8380

**Damon John Chetson**

The Chetson Firm, PLLC  
19 W. Hargett St., Suite 508  
Raleigh, NC 27601  
919-352-9411

**Geoffrey Ryan Willis**

Dysart Willis, PLLC  
507 N. Blount Street  
Raleigh, NC 27604  
919-747-8380

**Raymond C. Tarlton**

Post Office Box 1386  
150 Fayetteville Street, Suite 930  
Raleigh, NC 27602

/s/ Barbara D. Kocher

BARBARA D. KOCHER

Assistant United States Attorney